

# ETHAN D. IRWIN, P.L.L.C.

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July 19, 2023

**VIA ECF ONLY**

Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: S.T., an infant, by MNG, Crystal Williams, et ano. v. City of New York, et al.,  
21-cv-02248 (SHS)

Dear Hon. Stein:

As you know, our office represents the plaintiff. Copied hereto via ECF only is counsel for defendants.

I am writing to request an adjournment of tomorrow's conference.

I am previously engaged in court on Thursday July 20, 2023 starting at 10:00 a.m. in Nassau Supreme Court on a very convoluted matter that involves 10 defendants, a discovery conference, and motions. I do not expect to be finished in time to make it from Nassau to Manhattan by 2:00 p.m. and respectfully request that the conference be adjourned to a later date or the Court permit my co-counsel Joel Wertheimer to handle the conference in my place. We called and emailed counsel for defendants and requested the adjournment but have not yet heard back.

Additionally, per the Court's the July 18, 2023, please find attached the Rule 68 offers for both plaintiffs, signed retainer amendment, emails accepting the Rule 68 offer, and emails accepting attorneys fees.

Of course, should you have any questions, or wish to discuss the matter in greater detail, please do not hesitate to contact the undersigned. Thank you for your time and attention.

CC: Defendants by ECF Only

Encls.

Very truly yours,

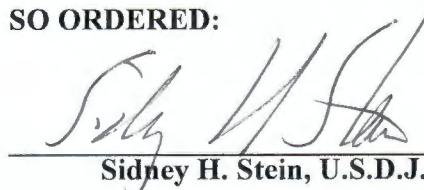


Ethan D. Irwin

**Joel Wertheimer may handle the conference tomorrow at 2:00 p.m. in Courtroom 23A.**

**Dated: New York, New York**  
July 19, 2023

**SO ORDERED:**



Sidney H. Stein, U.S.D.J.